

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CURTIS JAMES JACKSON III :  
p/k/a 50 CENT, TOMORROW TODAY :  
ENTERTAINMENT, INC., a New York :  
corporation, and G-UNIT RECORDS, INC., :  
a New York corporation, :  
Plaintiffs, :  
vs. :  
LEE Q. ODENAT a/k/a "Q" d/b/a :  
WWW.WORLDSTARHIPHOP.COM, :  
WORLDSTAR HIP HOP, INC., :  
a Nevada corporation, WORLDSTAR, LLC, :  
a Delaware limited liability company, :  
WSHH337, LLC, a Delaware limited :  
liability company, JOHN DOE LLC(S)/ :  
CORPORATIONS, :  
Defendants, :  
vs. :  
YVES MONDESIR, :  
Third-Party Defendant. :  
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Case No. 09-CV-5583 (JFK)

**ANSWER TO  
SUPPLEMENTAL  
COMPLAINT**

Defendants Lee Q. Odenat d/b/a [www.worldstarhiphop.com](http://www.worldstarhiphop.com) ("Odenat"), Worldstar Hip Hop, Inc. (Worldstar Hip Hop"), Worldstar, LLC ("Worldstar") and WSHH337, LLC ("WSHH337, LLC") (collectively "Defendants"), by and through their attorneys, Zarin & Associates P.C., answer Plaintiffs Curtis James Jackson III, Tomorrow Today Entertainment, Inc. and G-Unit Records, Inc.'s (collectively "Plaintiffs") Supplemental Complaint as follows:

1. Defendants admit the allegations contained in paragraph 1 of the Supplemental Complaint.
2. Defendants deny the allegations contained in paragraph 2 of the Supplemental Complaint.
3. Defendants deny the allegations contained in paragraph 3 of the Supplemental Complaint.
4. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 4 of the Supplemental Complaint.
5. Defendants deny the allegations contained in paragraph 5 of the Supplemental Complaint.
6. Defendants admit the allegation contained in paragraph 6 of the Supplemental Complaint that Plaintiffs seek injunctive relief in this matter, but deny all the remaining allegations in this paragraph.
7. Defendants deny the allegations contained in paragraph 7 of the Supplemental Complaint.

## **AFFIRMATIVE DEFENSES**

### **First Affirmative Defense**

The Complaint fails to state a claim upon which relief can be granted.

### **Second Affirmative Defense**

The Court lacks personal jurisdiction over all Defendants.

### **Third Affirmative Defense**

Any alleged transfer of assets to Defendants Worldstar Hip Hop, Worldstar and WSHH337 was not fraudulent.

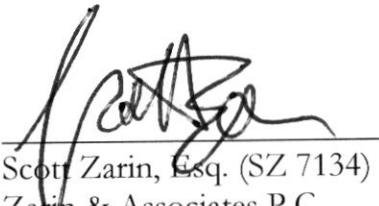
### **Fourth Affirmative Defense**

The corporate veil between Defendant Odenat, on the one hand, and Defendants Worldstar Hip Hop, Worldstar and WSHH337, on the other hand, cannot be pierced.

WHEREFORE, Defendants demand a judgment dismissing Plaintiffs' Supplemental Complaint, along with an award of costs, disbursements and reasonable attorney fees, in addition to such other relief as this Court deems just and proper.

Dated: March 28, 2012

By:



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Attorneys for Defendants  
Lee Q. Odenat d/b/a  
[www.worldstarhiphop.com](http://www.worldstarhiphop.com)  
Worldstar Hip Hop, Inc.  
Worldstar, LLC  
WSHH337, LLC

**Certificate of Service**

I, Scott Zarin, declare, under penalty of perjury, that on March 28, 2012, I caused to be served in *Jackson v. Odenat*, S.D.N.Y. Case No. 09-5583, via e-mail and U.S. Mail:

**ANSWER TO SUPPLEMENTAL COMPLAINT**

on counsel for Plaintiffs:

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Date: 3/28/12

